

**STATE OF NEW MEXICO
BEFORE THE SECRETARY OF ENVIRONMENT**

**NEW MEXICO ENVIRONMENT
DEPARTMENT RESOURCE PROTECTION DIVISION,**

Complainant,
v.

No. SWB 20-001 (CO)

BL SANTA FE, LLC,

And

HRV HOTEL PARTNERS, LLC,

Respondents.

UNOPPOSED MOTION TO VACATE AND RESET HEARING

COMES NOW Respondent HRV Hotel Partners, LLC., through its counsel of record, Domenici Law Firm, P.C. (Pete V. Domenici, Jr.) and for its Motion to Vacate and Reset the January 26, 2022 hearing, states as follows:

1. An Entry of Appearance for Respondent HRV Hotel Partners, LLC. was filed January 10, 2022, naming Domenici Law Firm, P.C. as new counsel for HRV.
2. There is new and ongoing information being developed on remediation costs and penalties in this matter.
3. There is new and ongoing information being developed on settlement with the other respondent in this matter.
4. Counsel for HRV needs time to obtain and analyze the new information.
5. NMED does not oppose this Motion to Vacate and Reset the January 26, 2022 hearing.

WHEREFORE, Respondent respectfully motions for the January 26, 2022 hearing to be vacated and reset.

Respectfully submitted,

DOMENICI LAW FIRM, P.C.

/s/ Pete V. Domenici, Jr.

Pete V. Domenici, Jr., Esq.

320 Gold Avenue SW, Suite 1000

Albuquerque, New Mexico 87102

(505) 883-6250

pdomenici@domenicilaw.com

Counsel for Respondent HRV Hotel Partners, LLC.

I hereby certify that a true and correct copy of the foregoing *Unopposed Motion to Vacate and Reset January 26, 2022 Hearing* was served via first class mail and email on this 11th day of January 2022 to the following:

Madai Corral
Office of Public Facilitation
New Mexico Environment Department
1190 St. Francis Drive, Santa Fe, NM 87505
Madai.corral@state.nm.us

Hearing Clerk

Christopher Atencio
Assistant General Counsel
Legislative & Policy Legal Analyst
New Mexico Environment Department
Office of General Counsel
121 Tijeras Ave. NE
Albuquerque, NM 87102
Christopher.atencio@state.nm.us

Counsel for the New Mexico Environment Department

Gregory J. Marshall
Snell & Wilmer, LLP.
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2202
Telephone: (602) 382-6514
Email: gmarshall@swlaw.com

Counsel for Respondent BL Santa Fe, LLC

/s/ Pete V. Domenici, Jr.

Pete V. Domenici, Jr., Esq.